

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

HANS MOKE NIEMANN,

Plaintiff,

vs.

SVEN MAGNUS ØEN CARLSEN A/K/A
MAGNUS CARLSEN, PLAY MAGNUS AS
D/B/A PLAY MAGNUS GROUP, CHESS.COM,
LLC, DANIEL RENSCH A/K/A “DANNY”
RENSCH, AND HIKARU NAKAMURA,

Defendants.

Case No. 4:22-cv-01110-AGF

Hon. Audrey G. Fleissig

**CHESS.COM, LLC’S UNSEALED MOTION FOR SEALING
PURSUANT TO RULE 13.05 (FILED WITHOUT ATTACHMENTS)**

1. A sealed memorandum in support of this unsealed motion for sealing is being filed separately in connection with this motion as required by Eastern District of Missouri Local Rule 13.05A(4)(b)(i). Chess.com, LLC (“Chess.com”) seeks leave to file under seal the Rule 7.1 Corporate Disclosure Statement by Defendant Chess.com, LLC. Without disclosing the information sought to be kept confidential, Chess.com’s corporate disclosure lists 40 separate individuals and entities whose identification alone may be used for improper purposes and compromise Chess.com’s competitive standing. Chess.com is a private company with several members, and only one these individuals and entities, Defendant Daniel “Danny” Rensch, is a party to this litigation. Mr. Rensch has already filed his own disclosure statement identifying his citizenship.

2. As detailed in the supporting memorandum, the public’s interest in access to Chess.com’s ownership information is minimal while the legal grounds in support of this request include the privacy interests of the non-parties as well as Chess.com’s interest in protecting its “confidential and competitively sensitive information.” *See, e.g., IDT Corp. v. eBay*, 709 F.3d

1220, 1223-24 (8th Cir. 2013).

3. The duration of this request is indefinite because neither the privacy interests of the individuals and entities nor the proprietary and sensitive nature of their disclosure will diminish over time.

DATED: December 9, 2022

Respectfully Submitted,

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Counsel for Defendant Chess.com, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 9, 2022, the foregoing document was served on all counsel of record by ECF and electronic mail.

DATED: December 9, 2022

/s/ Jeffrey B. Jensen

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